

Clerk, U.S. District Court  
Southern District of Texas  
FILED

SEP 23 2014

David J. Bradley, Clerk of Court

A091 (Rev. 8/01) Criminal Complaint

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS

UNITED STATES OF AMERICA

V.

India Treniek PRICE  
Debra Kay DENNIS

CRIMINAL COMPLAINT

Case Number: C-14-1007M

I, the undersigned complainant state that the following is true and correct to the best of my knowledge and belief. On or about September 22, 2014 in Kenedy County, in the  
(Date)

Southern District of Texas defendant, India Treniek PRICE & Debra Kay DENNIS

did knowingly or in a reckless disregard of the fact that an alien had come to, entered, or remained in the United States in violation of law, transport, or move or attempt to transport or move such alien within the United States by means of transportation or otherwise, in furtherance of such violation of law

in violation of Title 8 United States Code, Section(s) 1324  
I further state that I am a(n) Special Agent and that this complaint is based on the  
following facts: Official Title

See Attached Affidavit of ICE Special Agent Mark D. Rodriguez

Continued on the attached sheet and made a part of this complaint:

☒ Yes ☐ No

Mark D. Rodriguez  
Signature of Complainant

Mark D. Rodriguez  
Printed Name of Complainant

Sworn to before me and signed in my presence, and probable cause found on

September 23, 2014  
Date

Jason B. Libby U.S. Magistrate Judge  
Name and Title of Judicial Officer

at

Corpus Christi, Texas  
City and State  
Jason B. Libby  
Signature of Judicial Officer

AFFIDAVIT

On September 22, 2014, India Treniek PRICE and Debra Kay DENNIS, were apprehended at the United States Border Patrol Checkpoint near Sarita, Texas in an attempt to smuggle one (1) Undocumented Alien (UDA Pablo PINZON-Vasquez), through the checkpoint.

On September 22, 2014, Border Patrol Agent (BPA) John Wolfe, was working the primary inspection lane at the United States Border Patrol Checkpoint near Sarita, Texas. At approximately 10:50 am, a Gray GMC Extended Cab Pickup entered the primary inspection area. BPA Wolfe initiated the immigration inspection with the driver, India Treniek PRICE, by identifying himself as a United States Border Patrol Agent and asking PRICE if she was a United States Citizen, which PRICE replied, "Yes, I am." BPA Wolfe proceeded to perform an immigration inspection on the front passenger, Debra Kay DENNIS. BPA Wolfe asked DENNIS if she was a United States Citizen, which DENNIS replied, "Yes, I am." BPA Wolfe proceeded to ask PRICE where they were going, to which PRICE replied, "San Antonio." BPA Wolfe then asked PRICE where they were coming from. PRICE replied, "McAllen." BPA Wolfe then asked PRICE why they are coming up Highway 77 to go to San Antonio instead of Highway 281, which would be quicker if they were going to San Antonio. PRICE replied, "She told me to come this way, I'm not sure why." BPA Wolfe asked DENNIS why they were travelling on Highway 77, to which DENNIS replied, "I have family in San Antonio and PRICE has family in Dallas." BPA Wolfe asked who owned the truck and DENNIS replied, "A friend of mine is the owner."

During BPA Wolfe's questioning of the driver and passenger, Border Patrol Agent Reynaldo Garcia and his canine partner Rico-I, were conducting a non-intrusive free air sniff of the exterior of the vehicle. BPA Garcia then informed BPA Wolfe that his canine was alerting to the back part of the cab of the pickup. BPA Wolfe then asked for and received consent from PRICE and DENNIS to further inspect the vehicle in the secondary inspection area. At this time, BPA Wolfe referred PRICE to the secondary inspection area.

Once in Secondary, Border Patrol Agent, Alex Martinez escorted the PRICE and DENNIS into the waiting area inside the checkpoint.

Upon further inspection of the vehicle by BPA Garcia in the secondary area, an undocumented alien, Pablo PINZON-Vasquez, was found concealed on the floor, behind the back seat of the truck, in a tight space not intended for a passenger.

The principals India Treniek PRICE and Debra Kay DENNIS, were placed under arrest and then escorted into the Checkpoint near Sarita, Texas for further processing and disposition. The smuggled alien Pablo PINZON-Vasquez was then removed from the vehicle and escorted inside the Checkpoint near Sarita, Texas for further processing and disposition.

Border Patrol Agent Domingo Serna read PRICE and DENNIS their Miranda Rights in English as per Service Form I-214 and were witnessed by Border Patrol Agent Alex Martinez. Both PRICE and DENNIS said they understood their rights and did not want a lawyer present. Both PRICE and DENNIS signed the forms, I-214E indicating so.

BPA Reynaldo Garcia advised the undocumented alien, Pablo PINZON-Vasquez, his Miranda Rights in Spanish as per Service Form I-214S, witnessed by BPA John Wolfe. PINZON said he understood his rights and did not want a lawyer present. PINZON signed the form, I-214S indicating so.

BPA Wolfe questioned PRICE about the illegal alien in the vehicle and she stated that she had no knowledge that he was in the back. PRICE stated that she has no money and is not working, but that DENNIS offered to pay for her ticket to Dallas, Texas so she can visit family. PRICE advised that they flew into Dallas, Texas from Santa Anna, California. From Dallas they took a connecting flight to San Antonio, Texas. From San Antonio they took a bus to McAllen, Texas. They stayed at a motel where a friend of Dennis dropped off a truck for them to drive. PRICE stated that DENNIS did not want to go up Highway 281 and wanted to go up Highway 77 to get to San Antonio.

BPA Wolfe questioned Debra DENNIS about the illegal alien in the vehicle and DENNIS stated that she knew the illegal alien was under the backseat of the truck. DENNIS stated that she was going to get paid \$1000.00 once she delivered the illegal alien to San Antonio, Texas. DENNIS stated that her contact, made all the arrangements for DENNIS to smuggle the alien from McAllen, Texas to San Antonio, Texas. DENNIS stated that her contact delivered the truck with the alien in it to her motel. DENNIS stated that once she got to San Antonio, another contact would meet them to pick up the truck with the alien.

At 2:40 pm, BPA John Wolfe asked for and was granted consent to search the cell phone of Debra DENNIS with no restrictions. Found on the cell phone were previous calls to her contact at 9:35 am on 9/22/2014. DENNIS also received a text from her contact at 9:37 am on 9/22/2014.

BPA Wolfe questioned the undocumented alien, Pinzon about the driver and passenger. PINZON stated that he was put into the truck by an unknown man before the two ladies got into the truck and started driving. PINZON stated that he paid a total of \$4000.00 to be smuggled. PINZON stated that his final destination was Los Angeles, California.

On September 22, 2014 at approximately 4:00 pm, Department of Homeland Security (DHS), Homeland Security Investigations (HSI) Special Agent (S/A) Mark D. Rodriguez arrived at the US Border Patrol Checkpoint near Sarita, Texas to initiate an investigation.

S/A Rodriguez conducted a search of the vehicle used in the smuggling scheme. Discovered in the center console of the vehicle was paperwork detailing the sale of the 1999 GMC Sierra gray pickup truck. The seller is listed as Fast Auto Sales located at 620 E US Hwy 83 Ste B, McAllen, Texas 78501 sold the vehicle on 09/01/2014 to Maria Nieves Carbajal Mejia for the price of \$3,544.72

The vehicle was insured by Loya Insurance Company under the name Maria Nieves Carbajal Mejia, for a 30 day policy beginning on 09/06/2014 at 11:22:45 hours through October 6, 2014 in the amount of \$78.00. The vehicle is registered under Maria Nieves Carbajal Mejia.

American Airline tickets were discovered under the names of India Treniek PRICE and Debra Kay DENNIS departing Santa Ana, California on September 20, 2014, flight 1176 to Dallas Fort Worth, Texas and connecting to San Antonio, Texas, flight 296.

Also discovered were two (2) Greyhound Lines, Inc bus tickets departing September 21, 2014 at 1:50 am, arriving at Falfurrias, Texas at 4:30 am and departing at 4:45 am to McAllen, Texas at 5:45 am.

Discovered in PRICE's possession was a notebook with the following information:  
McCallum, Texas, Mission, Texas, Edinburg, Texas, McAllen

- Flying in from another city, how far or up to how much will you pay? To McCallum
- People arrive, greeted by self.
- Stay at apt/trailer/hotel \$229 wk / rent \$ 549 & 587 manor apts

S/A Rodriguez was granted written consent to search DENNIS' Samsung flip phone revealing the following text messages sent between DENNIS and PRICE, saved as "India," discussing the smuggling

activity. PRICE sent a text message from phone on September 14, 2014 to DENNIS stating, "I am nervous but I need the money. Idk wha to do cuz I need to go. How many days in jail you do."

DENNIS responded with the message, "I didn't do any. They let me go. He said that's been the case every time. I REALLY don't want to be texting this shit. Can we meet tomorrow? I also need some real shit

India: Okkay

DENNIS: So can I tell him ur coming on Thursday? He's anxious. Thinkin about going myself

S/A Rodriguez was granted written consent to search DENNIS' MetroPCS cell phone, which revealed the following:

A text message received from DENNIS' contact to DENNIS with the message of a phone number from another contact in San Antonio, Texas at 9:37 am on September 22, 2014.

On the phone contact list was only five (5) phone calls

DENNIS' contact - outgoing at 2:25, September 22, 2014. 0 secs

Unknown missed calls - throughout September 22, 2014 between the hours of 10:40 am and 12:15 pm.

DENNIS's contact - outgoing at 9:35 am on September 22, 2014. 28 secs

DENNIS' contact - outgoing at 9:05 am on September 22, 2014. 7 secs

DENNIS' contact -missed call at 9:00 am and 9:01 am.

All of the individuals involved appeared to be in good health.

Assistant United States Attorney (AUSA) Kenneth Cusick was contacted and advised of the arrests of US Citizen India Treniek PRICE and US Citizen Debra DENNIS. AUSA Cusick agreed to prosecute both PRICE and DENNIS for violating Title 8 USC 1324 (alien smuggling).

  
Mark D. Rodriguez  
Special Agent  
Homeland Security Investigations (HSI)

**SWORN TO AND BEFORE ME, PROBABLE CAUSE FOUND**  
**THIS 23<sup>rd</sup> DAY OF September 2014.**

  
Jason B. Libby, United States Magistrate Judge